

JAP:EMR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

18M129 -

UNITED STATES OF AMERICA

FILED UNDER SEAL

- against -

RAYMOND LEONARD,

Defendant.

AFFIDAVIT AND COMPLAINT
IN SUPPORT OF AN ARREST
WARRANT

(T. 8, U.S.C., §§ 1326(a) and
1326(b)(2))

EASTERN DISTRICT OF NEW YORK, SS:

ANDREW STEINBORN, being duly sworn, deposes and states that he is a
Deportation Officer with the Department of Homeland Security, United States Immigration and
Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, there is probable cause to believe that on or about
September 8, 2017, within the Eastern District of New York and elsewhere, the defendant
~~RAYMOND LEONARD being an alien who had previously been arrested and convicted of~~
an aggravated felony, and was thereafter excluded and removed from the United States, and
who had not made an application for admission to the United States to which the Secretary of
the Department of Homeland Security, successor to the Attorney General of the United States,
had expressly consented, was found in the United States.

(Title 8, United States Code, Section 1326(b)(2)).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Deportation Officer with United States Immigration and Customs Enforcement ("ICE") and have been involved in the investigation of numerous cases involving the illegal reentry of aliens. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the ICE investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

2. The defendant RAYMOND LEONARD is a citizen and national of Guyana who was convicted of Attempted Assault in the Second Degree, an aggravated felony offense, on or about February 1, 1995. The defendant was sentenced to term of incarceration of 18 months to three years. On March 23, 2010, he was removed to Guyana.

3. The defendant RAYMOND LEONARD was arrested on or about September 8, 2017, in Brooklyn, New York on charges of Criminal Possession of a Controlled Substance in the Seventh Degree, Unauthorized Use of a Motor Vehicle, and Driving While Intoxicated. The defendant was released with a pending court date of October 24, 2017. On that date, the defendant failed to appear and a bench warrant was issued for his arrest.

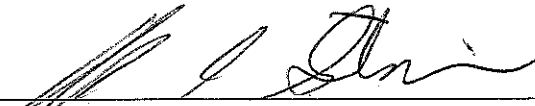
¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

4. After the defendant RAYMOND LEONARD was arrested on September 8, 2017, he was fingerprinted by the New York City Police Department. ICE subsequently received biometric confirmation that the fingerprints taken at the time of the defendant's September 8, 2017 arrest match the fingerprints on file with ICE that are associated to LEONARD.

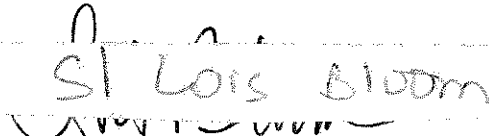
5. A search of immigration records has revealed that there exists no request by the defendant for permission from either the United States Attorney General or the Secretary of the Department of Homeland Security to re-enter the United States after removal.

6. I request that the Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the affidavit and arrest warrant. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and arrest warrants via the internet. Therefore, premature disclosure of the contents of this affidavit and related documents could seriously jeopardize the investigation by giving the defendant an opportunity to flee from prosecution.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant RAYMOND LEONARD so that he may be dealt with according to law.


ANDREW STEINBORN
Deportation Officer
United States Immigration and Customs
Enforcement

Sworn to before me this
13th day of February, 2018


THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

